

Nixon Peabody LLP  
437 Madison Avenue  
New York, New York 10022

By: Craig R. Trachtenberg Pa. Id. 34636  
(212) 940-3722 (Telephone)  
(866) 852-2714 (Facsimile)

Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

**DUNKIN' DONUTS FRANCHISING LLC,  
DD IP HOLDER LLC, and BASKIN-  
ROBBINS FRANCHISING LLC,  
Plaintiffs,**

- vs. -

**CLAUDIA III, LLC, et. al.**

**Defendants.**

**C.A. NO.: 14-CV-2293**

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION  
AGAINST DEFENDANTS**

Plaintiffs Dunkin' Donuts Franchising LLC, DD IP Holder LLC, and Baskin-Robbins Franchising LLC, by their counsel, move for a preliminary injunction against Defendants to enjoin Defendants from holding themselves out as an authorized franchisee at 230 Route 313, #1, Perkasie, PA 18944, and to de-image and de-identify the location. The basis of the motion is Defendant Claudia III, LLC has refused to report weekly sales, pay royalties and advertising fees, maintain the appearance of the restaurant, and the franchise agreement authorizing operation of the franchised location was terminated because of this material default and repudiation of the franchise relationship.

The motion is based upon the Certification of Gary Zullig and the Memorandum of Law.

Dated March 2, 2015

Respectfully submitted,

s/ Craig R. Tractenberg

---

Craig R. Tractenberg, Esq. (Pa. ID #34636)  
Nixon Peabody LLP  
PA ID No. 34636  
1515 Market Street  
Suite 1200  
Philadelphia, PA 19102  
(215) 246-3525  
Attorneys for Plaintiffs